

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

DANIELLE CIRILLO, on behalf of herself )  
and all others similarly situated, )

*Plaintiff,* )

v. )

CITRIX SYSTEMS, INC., )

*Defendant.* )

CA NO.: 5:21-cv-00088-BO

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**PLAINTIFF’S MOTION TO CONDITIONALLY CERTIFY THIS MATTER AS A  
COLLECTIVE ACTION AND FOR A COURT-AUTHORIZED NOTICE TO BE  
ISSUED UNDER SECTION 216(B) OF THE FAIR LABOR STANDARDS ACT**

Plaintiff Danielle Cirillo, on behalf of herself and all others similarly situated, through her undersigned attorneys, hereby moves for the following relief: (1) conditional certification of this action and for court-authorized notice pursuant to § 216(b) of the Fair Labor Standards Act (“FLSA”); (2) approval of the proposed FLSA notice of this action and the consent form; (3) a production of names, last known mailing addresses, last-known cell phone numbers, email addresses, work locations, and dates of employment of all putative plaintiffs within 15 days of the Order; and (4) ability to distribute the Notice and Opt-in Form via first class mail, email, and text message as well as via radio and/or social media postings to all putative plaintiffs of the conditionally certified collective, with a reminder mailing to be sent 45-days after the initial mailing to all non-responding putative plaintiffs.

In support of her motion, Plaintiff shall rely upon the accompanying Memorandum of Law, exhibits attached thereto, and documents previously submitted for the Court’s review.

Respectfully submitted, this April 2, 2021.

/s/ Gilda A. Hernandez

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 2, 2021, I electronically filed the foregoing true and accurate copy of **PLAINTIFF'S MOTION TO CONDITIONALLY CERTIFY THIS MATTER AS A COLLECTIVE ACTION AND FOR A COURT-AUTHORIZED NOTICE TO BE ISSUED UNDER SECTION 216(B) OF THE FAIR LABOR STANDARDS ACT** with the Court using the CM/ECF system, and I hereby certify that I have thereby electronically served the document on the following:

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